

**REMARKS**

Claims 1 through 4 are currently pending in the application.

Claim 4 is withdrawn from consideration as being directed to a non-elected invention.

This amendment is in response to the final Office Action of June 10, 2005.

**35 U.S.C. § 103(a) Obviousness Rejections**

**Obviousness Rejection Based on Palagonia (U.S. Patent 5,604,377) in view of Nishino (U.S. Patent 5,343,075)**

Claims 1 through 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Palagonia (U.S. Patent 5,604,377) in view of Nishino (U.S. Patent 5,343,075). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed invention to clearly distinguish over the cited prior art.

Turning to the cited prior art, the Palagonia reference is directed to a packaging scheme for a stack of semiconductor chips. The stack of semiconductor chips are connected to a wiring interface. Separating each of the chips from any adjacent chip is a supporting, insulating interposer. The interposers are cantilevered shelves of a rack. Lead frame fingers contacting solder balls on the semiconductor chips connect the chips to a printed circuit board.

Applicants assert that any combination of the Palagonia reference and the Nishino reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1 and 3 because any combination of the cited prior art fails teach or suggest all of the claim limitations and the only suggestion for any combination of the cited prior art is solely Applicants' disclosure, not any suggestion in the cited prior art.

Applicants assert that any combination of the Palagonia reference and the Nishino reference fails to teach or suggest the claim limitations of the claimed inventions of presently amended independent claims 1 and 3 calling for “providing a plurality of primary integrated circuit packages, each primary integrated circuit package having a plurality of leads extending from opposed sides thereof”, “providing a cage enclosing at least three adjacent sides of the plurality of sides of each primary integrated circuit package of the stacked plurality of primary integrated circuit packages”, “attaching the cage to the substrate, the cage connecting at least two outer opposed leads of the plurality of outer leads of the stacked plurality of primary integrated circuit packages to at least one conductive bus of a plurality of spaced transverse conductive buses”, “providing a cage enclosing at least three adjacent sides of the plurality of sides of each primary integrated circuit package of the stacked plurality of primary integrated circuit packages, each primary integrated circuit package having opposed leads extending from opposed sides thereof” and “attaching the cage to the substrate, the cage connecting at least two outer opposed leads of the plurality of outer leads of the stacked plurality of primary integrated circuit packages to at least one conductive bus of a plurality of spaced transverse conductive buses”. Applicants assert that any combination of the Palagonia reference and the Nishino reference teaches or suggests the use of a cage having a conductor on the side thereof contacting the leads of the printed circuit board to which the leads are fixed. Such is not the claimed inventions of presently amended independent claims 1 and 3. Accordingly, any combination of the Palagonia reference and the Nishino reference fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1 and 3. Accordingly, presently amended independent claims 1 and 3 are allowable as well as dependent claim 2.

Additionally, Applicants assert that the sole suggestion for any combination of the Palagonia reference and the Nishino reference is solely Applicants' disclosure, not the cited prior art, as the cited prior art contains no suggestion whatsoever for any combination thereof. Such is evidenced by the fact that any modification of the Palagonia reference based upon the Nishino reference clearly destroys the invention of the Palagonia reference because the leads and printed circuit board of the Palagonia reference must be eliminated when the packaged semiconductor die of Nishino is substituted for the unpackaged semiconductor chip of Palagonia. Therefore, any combination of the Palagonia reference and the Nishino reference fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1 and 3. Accordingly, presently amended independent claims 1 and 3 are allowable as well as dependent claim 2.

Applicants request entry of this amendment for the following reasons:

The amendment is timely filed.

The amendment places the application in condition for allowance.

The amendment does not require any further search or consideration.

Applicants submit that claims 1 through 3 are clearly allowable over the cited prior art.

Applicants request the entry of this amendment, the allowance of claims 1 through 3, and the case passed for issue.

Respectfully submitted,



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